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SCOTT WARREN, and REX SHUPE*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as
next friend of A.D., a Minor,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.,
SCOTT WARREN, and REX SHUPE

Defendants.

Case No.: 2:19-cv-01322-KJD-DJA

**FRONTIER AIRLINES, INC.'S
ANSWERS TO PLAINTIFF
A.D.'S FOURTH INTERROGATORIES**

**DEFENDANT FRONTIER AIRLINES, INC.'S
ANSWERS TO PLAINTIFF A.D.'S FOURTH INTERROGATORIES**

Defendant FRONTIER AIRLINES, INC. ("Frontier"), by its undersigned attorneys, provides the
following Answers to Plaintiff A.D.'s Fourth Interrogatories.

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1 1. Please state whether any of the four flight attendants assigned to work on Flight 2067 (i.e.,
2 Anna Bond, Chelsie Bright Sakurada, Amanda Nickel, Scott Warren) worked on any other flight operated
3 by Frontier between October 28, 2016, and the date of your answer to this Interrogatory that was the subject
4 of a passenger complaint of discrimination based on race or ethnicity, and for each such passenger
5 complaint, please state the date of the flight, the origin and destination airports for the flight, the names and
6 duty assignments (i.e., FA-A, FA-B, FA-C, FA-D) of all flight attendants assigned to that flight, the details
7 of the passenger complaint, and the Bates numbers of any documents previously produced concerning that
8 passenger complaint.

9 **ANSWER:** Frontier objects to Interrogatory No. 1 on the grounds that it is overbroad because it seeks
10 information outside the scope of the Court's Orders dated March 29, 2021 (ECF 120) and August 5, 2022
11 (ECF 192). In the Order dated March 29, 2021, the Court ordered production of complaints that were filed
12 by passengers during the five-year period prior to the date of the incident, or between March 28, 2014 –
13 March 28, 2019. In the Order dated August 5, 2021, the Court granted Plaintiffs leave to serve a single
14 interrogatory that was to be "limited to asking whether any of the Frontier employees on Plaintiffs' flight
15 were identified in any of the complaints Frontier previously produced." Subject to and without waiving the
16 objections stated above, Anna Bond, Chelsie Bright Sakurada, Amanda Nickel, and Scott Warren were not
17 identified in any of the complaints Frontier previously produced.

18 2. For each passenger complaint identified in your answer to Interrogatory 1 above, please
19 identify any flight attendant who received discipline from **Frontier** in connection with that
20 passenger complaint, and provide the details of the discipline imposed.

21 **ANSWER:** Not applicable.

22 DATED this 7th day of September, 2022

Respectfully submitted,

FRONTIER AIRLINES, INC.

/s/Brian T. Maye

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CERTIFICATE OF SERVICE

Pursuant to LR IC 4-1, I hereby certify that on the 7th day of September, 2022, the foregoing **DEFENDANT FRONTIER AIRLINES, INC.'S ANSWERS TO PLAINTIFF A.D.'s FOURTH INTERROGATORIES** was served upon the following counsel of record *by email only*:

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